

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

GREGOIRE TOURNANT,
Defendant.

Case No. 22-CR-276 (LTS)

**DECLARATION OF SETH L. LEVINE IN SUPPORT OF DEFENDANT GREGOIRE
TOURNANT’S MEMORANDUM REGARDING THE APPLICABLE SENTENCING
GUIDELINES**

Seth L. Levine, pursuant to 28 U.S.C. § 1746, states the following:

1. I am a partner of the law firm Levine Lee LLP, counsel for Gregoire Tournant in this action.
2. I submit this declaration in support of Mr. Tournant’s Memorandum Regarding the Applicable Sentencing Guidelines.
3. Attached hereto as **Exhibit A** is a true and correct copy of the expert report of Israel Nelken, dated November 1, 2024.
4. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from a May 5, 2021 presentation to the Securities and Exchange Commission (“SEC”) on behalf of Allianz, Bates-stamped SDNY_01_000052304 through SDNY_01_000052381.
5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from a November 18, 2021 presentation to the United States Attorney’s Office (“USAO”) for the Southern District of New York (“SDNY”) on behalf of Allianz, Bates-stamped SDNY_01_000054049 through SDNY_01_000054157.

6. Attached hereto as **Exhibit D** is a true and correct copy of an Allianz Global Investors US's ("AGI US") Structured Alpha 500 marketing deck, dated December 4, 2019, Bates-stamped AGISEC13081120 through AGISEC13081163.

7. Attached hereto as **Exhibit E** is a true and correct copy of an AGI US Structured Alpha 1000 LLC Confidential Private Placement Memorandum, dated December 31, 2017, Bates-stamped AGISEC10159758 through AGISEC10159822.

8. Attached hereto as **Exhibit F** is a true and correct copy of an AGI US Structured Alpha Structured Alpha 1000 LLC Subscription Agreement, dated February 2018, Bates-stamped AGISEC10159823 through AGISEC10159885.

9. Attached hereto as **Exhibit G** is a true and correct copy of a chart showing investor redemptions, Bates-stamped SEC-EMAILS-E-0006142 through SEC-EMAILS-E-0006143.

10. Attached hereto as **Exhibit H** is a true and correct copy of an AGI US Structured Alpha US Equity 250 marketing deck, dated May 29, 2019, Bates-stamped AGISEC12901534 through AGISEC12901579.

11. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
November 1, 2024

By: /s/ Seth L. Levine
Seth L. Levine